



June 17, 2021

***Via ECF***

The Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Courtroom 619  
New York, NY 10007

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Re: ***Tradeshift, Inc. v. Smucker Services Company, Case No. 1:20-cv-3661-ER: Leter Motion to Seal Exhibits D and E to Tradeshift's Premotion Letter Brief Re Premotion Letter Brief Re Hiles and Nowicki Depositions.***

Honorable Judge Edgardo Ramos:

Pursuant to Procedure 3(ii) of the Court's Individual Practices, Plaintiff Tradeshift, Inc. ("Tradeshift") respectfully requests leave to continue sealing of Exhibits D and E to Tradeshift's Premotion Letter Brief Re Premotion Letter Brief Re Hiles and Nowicki Depositions. Tradeshift is filing an under seal copy and a publicly redacted copy of that Letter Brief concurrently with this letter motion to seal.

Tradeshift seeks leave to file Exhibits D and E under seal pursuant to the protective order entered in this case on November 19, 2020. ECF 57. Pursuant to that order, Defendant Smucker designated the transcript from which Exhibit D is excerpted as Confidential and produced Exhibit E with a "Confidential" designation. Moreover the documents are submitted solely for purposes of resolving a discovery dispute.

Accordingly, Tradeshift requests that the Court continue to seal Exhibits D and E to Tradeshift's Premotion Letter Brief Re Hiles and Nowicki Depositions with only the public redacted version of the document being filed in the public docket.

Respectfully submitted,

*/s/ Jason K. Yu*

Jason K. Yu